



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
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February 26, 2021

BY ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Sean Debnam, 20 Cr. 669 (PAE)*

Dear Judge Engelmayer:

The Government writes to request an additional thirty days to continue the production of Rule 16 discovery in the above-captioned matter—until April 1, 2021—and on behalf of the parties to request a thirty-day adjournment of the conference currently scheduled for March 15, 2021.

During the most recent conference in this matter, the Court ordered the Government to produce Rule 16 discovery, including the electronic material obtained pursuant to search warrants within thirty days or, if necessary, to request additional time from the Court. The Government has produced Rule 16 discovery including certain electronic materials to defense counsel and the Government anticipates that it will have produced the substantial portion of Rule 16 material by the Court's thirty-day deadline. The review of search warrant returns is ongoing, however, and will not be complete prior to the original discovery deadline. The Government anticipates that review of the devices and accounts currently in the Government's possession should be complete within thirty days of the Court's original production deadline. The Government has been in communication with defense counsel about the discovery productions and is undertaking efforts to minimize the number of documents counsel will need to review in person and will continue to produce discovery electronically as much as possible and practicable.

Defense counsel has indicated that the defendant does not object to the requested extension and the parties jointly respectfully request that if the Court grants the Government's request that the Court adjourn the conference currently scheduled for March 15, 2021 so that defense counsel and the defendant may continue to review the discovery productions in advance of the next conference. The Government also respectfully requests that if the conference is adjourned, the Court exclude time under the Speedy Trial Act as the Government continues its discovery production, as the defense continues its review of discovery, and as the parties discuss potential pretrial resolution of the matter. Counsel for the defendant has indicated that the defendant consents to the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney


By: /s/ Brandon D. Harper
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cc: Kristen Santillo, Esq. (by ECF)

GRANTED. The Court adjourns the discovery deadline as requested, and adjourns the conference scheduled for March 15 until April 20, 2021 at 10:30 a.m. The Court excludes time until the next conference pursuant to 18 U.S.C. 3161(h)(7)(A), for the reasons stated above. The Clerk of Court is requested to terminate the motion at Dkt. No. 24.

3/1/2021

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge